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ABSTRACT

This publication reports a Virginia study of the structure of local education divisions, community colleges, and other organizations capable of delivering service to Comprehensive Employment and Training Act (CETA) clients. Its purpose was to determine how short-term-funded projects can utilize facilities and personnel with minimum disruption to those organizations. Section 1 overviews CETA in Virginia. The first part of section 2 examines the state-level mechanisms that exist for delivering services to CETA clients and for providing vocational education to the general population. These state agencies are discussed: Governor's Employment and Training Council, Department of Education (Vocational and Adult Education), Virginia Community College system, Virginia Employment Commission--CETA Division, and Virginia State Advisory Council on Vocational Education. The second part of the section contains thumbnail sketches of the scope of CETA/education linkages in four sections of the state--Arlington County, Peninsula Office of Manpower Programs, Regional Operations Center #1, and Regional Operations Center #5. Section 4 focuses on types of institutions used most frequently by CETA prime sponsors: public secondary schools, skill centers, community colleges, and proprietary schools. Procedural and policy issues and specific problems of CETA programs are discussed and recommendations made in section 5. (YLB)

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CETA/EDUCATION LINKAGES:

A Look at Problems of Short-Term Funding

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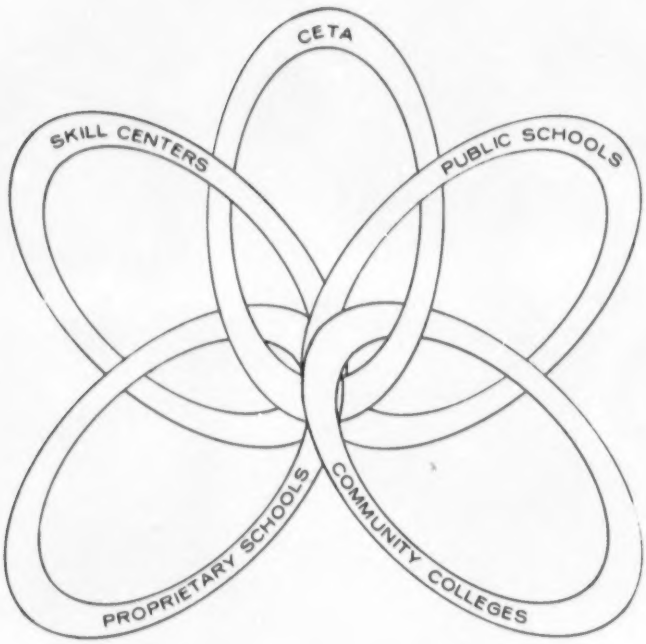

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PREFACE

This report fulfills a request by the Governor's Employment and Training Council to "study the structure of local education divisions, community colleges, (and) other organizations capable of delivering services to CETA clients...to determine how short-term funded projects can utilize facilities and personnel with minimum disruption to those organizations." The underlying assumptions that resulted in this request were: 1. that many areas of mutual concern exist between CETA and educational institutions; 2. that examples of productive working relationships ("linkages") between the two parties exist and can be usefully studied; and 3. that problems which inhibit these linkages can be identified and usefully studied.

Our work began at the state level where we examined the mechanisms that exist for delivering services to CETA clients and for providing vocational education opportunities to the population in general. Our feeling was that an understanding of the state mechanisms was important to an understanding of the problems at the local level.

Once we understood the delivery systems we began our field work in four selected geographical areas of the state. These areas were chosen primarily because of their economic differences. Taken together, we hoped that they would be representative of local situations in the State as a whole.

The research areas, and the jurisdictions that they encompass, are: 1. Arlington County Prime Sponsor (Arlington County); 2. Peninsula Office of Manpower Programs (POMP) Prime Sponsor (James City and York counties and the cities of Hampton, Newport News, Poquoson, and Williamsburg); 3. Regional Operations Center #1 of the Balance of State Prime Sponsor (Bland, Buchanan, Carroll, Dickenson, Grayson, Lee, Russell, Scott, Smyth, Tazewell, Washington, Wise and Wythe counties and the cities of Bristol, Galax and Norton); 4. Regional Operations Center #5 of the Balance of State Prime Sponsor (Accomack, Carolina, Essex, Gloucester, King and Queen, King George, King William, Matthews, Middlesex, Northampton, Northumberland, Richmond, Spotsylvania, and Stafford counties and the city of Fredericksburg).

This report is the result of our discussions with individuals representing many kinds of educational institutions, with state level educational planners and coordinators, and CETA planners and coordinators at both the state and local levels. The report focuses on specific problems which are discussed in detail. However, it should be remembered that the ultimate goal in linking the CETA program with educational institutions is to insure that individuals needing job training benefit from projects that pool the best efforts on their communities. We hope that our work will help in realizing that goal.

I. A QUICK LOOK AT CETA

The Comprehensive Employment and Training Act (CETA) of 1973 resulted from the consolidation of many categorical programs which were spawned in the 1960s under such legislation as the Manpower Development and Training Act and the Economic Opportunity Act. The original emphasis of CETA was on serving the employment needs of the disadvantaged, thus carrying forward the aims of the earlier legislation.* Since its enactment however, CETA has been used in two ways by the federal government: As the anti-poverty program it was designed to be (to counter what economists call "structural" unemployment), and as an anti-recession program (to counter "cyclical" unemployment). In the mid-1970s the public employment programs of CETA expanded rapidly as anti-recession measures, and jobs were made available to individuals who had been unemployed for only brief periods and who often needed little or no job training. It was these programs that incurred severe political criticism, and the "new" CETA (the CETA amendments of 1978) was a reaction to that criticism. The regulations that resulted from the changes in the CETA legislation, in addition to increasing administrative controls designed to prevent abuses, essentially directed prime sponsors to see to it that the program reverted to its original character as an anti-poverty program.

A program aimed at structural unemployment must by definition focus on individuals who have low job skills and other attributes that make them hard to employ. To serve them, the program emphasis must be on training. CETA has always looked to existing, local institutions to provide training so the concept of "linkages" with educational institutions is not new. What is needed now, it would seem, is to expand and strengthen CETA educational linkages to meet the challenge of training persons with few skills and a low level of motivation.

CETA is basically a federal revenue-sharing manpower program built on the concept of local prime sponsors. Any local jurisdiction with a population of 100,000 or more can become a prime sponsor by making application to the U.S. Department of Labor. To insure broad participation in the program at the local level each prime sponsor is required to have a local planning council which includes representatives from various segments of the population including "vocational education agencies" and "other education and training agencies and institutions." As we will point out later in this report, it is at the prime sponsor level—particularly on the local planning councils—that the most important CETA/education linkages begin.

In Virginia there are ten prime sponsors. Nine of them are units of local government (or in many cases, a consortium of local government units). The tenth prime sponsor is called the Balance of State (BOS) and covers all jurisdictions not covered by the other prime sponsors.

The CETA program presents significant problems for researchers in that it is a state wide program but it is not administered at the state level. In conducting this study we have tried to keep in mind the CETA program's unique structure. Although we concentrated our research in four specific geographical areas, we approached this study as a view of CETA/education linkage problems in Virginia as a whole. Although we sometimes comment on the effectiveness of particular arrangements in the four areas, we have made no attempt to evaluate the overall performance of the prime sponsors or other institutions, and our comments should not be construed as doing so. We hope that our recommendations will have state-wide implications. However, it is important for the reader to remember that changes in the CETA program cannot be mandated from the state level. Each prime sponsor will have to determine to what degree our recommendations are applicable to its operation and act accordingly.

*The original aim of the MDTA was to train workers displaced by automation. Its emphasis on training the disadvantaged began around 1967.

II. PLANNER AND COORDINATORS

A. State Level

Although the control of CETA programs is vested in local prime sponsors, several state agencies play an important role in the development of linkages between CETA and educational institutions. These agencies include: The Governor's Employment and Training Council (GETC), the Department of Education (Vocational and Adult Education), the State Offices of the Community College System, the Virginia Employment Commission's Balance of State CETA Division (BOS/CETA), and the Virginia State Advisory Council on Vocational Education. In pursuing our research, we interviewed key people in each of these agencies and reviewed relevant documents which were made available to us.

The following is a look at the role that each of these agencies plays in planning or coordinating the ties between CETA and educational institutions.

1. The Governor's Employment and Training Council (GETC)

The GETC is the closest thing there is to a state level CETA office in Virginia. State employment and training councils, such as the GETC, are mandated by the CETA regulations and are intended to provide coordination among all CETA programs in the State. Although the GETC has no direct control over the employment and training programs of the local prime sponsors, it is required to "review continuously the operation of programs conducted by the prime sponsors." It is also required—among other things—to prepare an Annual Report which analyzes the coordination of employment and training programs and recommends improvements, to comment on the reports of the Virginia State Advisory Council on Vocational Education, to review the Comprehensive Employment and Training Plans of the Prime Sponsors, to review the plans of other State agencies providing employment, training and related services, and to share with the Prime Sponsors information on economic development, vocational rehabilitation, Virginia Employment Commission activities, occupational demands and labor market demands.

These responsibilities—coupled with the GETC's role as funding agent for the Governor's Educational Linkages Grant—put the GETC in the position of being a catalyst for cooperative efforts between CETA and educational institutions in Virginia. The addition of the Linkages Grant has allowed the GETC to go beyond its traditional role as a monitor and evaluator of CETA/education linkage efforts and enabled it to fund programs or contract for services that will further these linkages state-wide.

When speaking of the GETC one is really speaking of two separate entities: The Council, which is appointed by the Governor, and the staff, which is an agency of state government under the Secretary of Commerce and Resources.

The Governor is required to appoint to the Council (which serves as an advisory body) representatives of the following groups: prime sponsors, labor, business, agriculture, the population to be served, the general public, and service delivery organizations. The regulations further stipulate that this last group, service delivery organizations, include a representative from the State Advisory Council on Vocational Education and the State Board of Vocation Education. The purpose of requiring the representation of these two agencies on the council is clearly an effort to foster cooperation between CETA and those responsible for vocational education planning at the state level. The Virginia Council also includes a representative from the State Community College System. The participation of these three agencies on the GETC is obviously an important step in promoting understanding between the prime sponsors and educators at the state level.

The GETC staff consists of 20 people. In the past the staff has played only a minimal role in the development of linkages with educational institutions, but this is likely to change now that the GETC has been given the responsibility for the Governor's Educational Linkages Grant.

The first step has been to hire an Educational Linkages Coordinator and to let a number of contracts to foster educational linkages, to evaluate past efforts, and to study specific problems. This report is the result of one of those contracts.

2. The Department of Education (Vocational and Adult Education)

The administrative structure of the vocational education component within the Virginia Department of Education has recently been reorganized. What was formally called the Division of Vocational Education is now a larger component within the Department with two Divisions of its own: Program Services; and, Administrative Services and Adult and Continuing Education. The overall component is called Vocational and Adult Education.

This component is clearly the most important office at the state-level involved in linking CETA and educational institutions. All federal and state funds for vocational education in Virginia's 141 school districts flow through the Vocational and Adult Education office. A comprehensive master plan for vocational education in the state is prepared every five years. Annual plans are prepared each year showing how the activities for the coming year will help accomplish the goals of the five-year plan. Each local school division submits its local plan to be included in the state plan. Local vocational education institutions and the Virginia State Advisory Council on Vocational Education review the plan and make recommendations prior to its being submitted to the State Board of Vocational Education. (In Virginia, the State Board of Education serves as the State Board of Vocational Education.)

The annual plan is particularly important to CETA-secondary education linkages. All vocational education activities undertaken by a local school division must be shown on the annual plan. Since the CETA year and the education year have different end dates, it is important that good linkages exist between the local CETA planner and the school district planner so that CETA activities can be written into the plan of the local school district.

The Department of Education plays another important role in CETA-educational linkages in that it is the designated recipient of the Governor's Special Grant (6% Funds) for Vocational Education. The Comprehensive Employment and Training Services (CETS) office of the Vocational and Adult Education component administers these funds which are allocated to each prime sponsor area according to a formula. The CETS office (in the name of the State Board of Vocational Education) and the local prime sponsor enter into a non-financial agreement which shows how the prime sponsor wants the funds to be spent. The CETS office then contracts directly with the educational institutions shown in the non-financial agreement. The funds provided by these grants enable the educational institutions to set up classes in the occupations specified in this contract. The prime sponsor, from its regular funding, covers the cost of intake and assessment, client allowances, job placement and follow-up and other costs.

This cooperative effort between the state agency responsible for vocational education and the local prime sponsors was an early and continuing effort to foster CETA education linkages. From our observation, these linkages seem to have been successful. (In the four areas covered by this study the 6% funds were used primarily to support classes in the skill centers.)

The CETS office also handles almost all of the regular funding for vocational training in the Balance of State prime sponsor area in much the same way that the Governor's vocational education funds are handled. If, for example, a local office of the BOS decides to fund a local community college for a CETA training class, the BOS first contracts with the CETS office and they in turn contract with the community college for the class. Although at first glance this would seem to be an awkward and unnecessary arrangement, it appears to work well, and we heard no serious complaints about it. (Some individual referral arrangements were, however, described as unnecessarily cumbersome.) The reasoning behind the arrangement is that the staff of the CETS office is more knowledgeable of vocational education matters than the prime sponsor and has the resources of other state vocational

education programs behind it and therefore is in a better position to see that successful programs are established.*

The CETS office has developed a reporting and evaluation system for monitoring the projects for which it contracts and periodically makes monitoring trips to the training sites. (All participants, however, are listed in the prime sponsors' regular reports.)

3. The Virginia Community College System

The State Offices of the Virginia Community College System provide supportive services to, and monitoring and evaluation of, the 23 local community colleges in the state. However, the role of the State Offices in developing linkages between CETA and the local community colleges does not appear to be a strong one.

According to Dr. Samuel Creighton, Deputy Chancellor for Academic and Student Affairs, each local college has its own president and governing board and the decisions on the curriculum to be offered by the college are made at the local level. This is in keeping with the philosophy of the colleges serving the needs of the local communities.

Dr. Creighton, who is the System's representative to the GETC, sees the State Offices playing an important role through the dissemination of information to the local colleges.

"We don't tell them (the local colleges) what courses to offer," said Dr. Creighton, "but we certainly encourage them to take on CETA training as a part of their commitment to the community."

4. Virginia Employment Commission—CETA Division

The Balance of State (BOS) prime sponsor is the only prime sponsor operated by a state agency—The Virginia Employment Commission. The BOS is unique in other ways as well. Its annual funding exceeds the annual funding of all the other prime sponsors combined. While most prime sponsors serve one—or a few contiguous jurisdictions with large populations—the BOS serves 77 mostly rural counties and 22 small cities.

In order to offer this large territory a degree of local control the VEC-CETA Division has divided the state into 17 Area Manpower Planning Districts. Each district is represented by an Area Manpower Planning Council (AMPC) which serves much the same function as a prime sponsor's employment and training council. These councils play an important role in planning CETA activities in their respective jurisdictions. The selection of representatives from local educational institutions to serve on the AMPC's provides an excellent opportunity to promote CETA/Education Linkages.

To facilitate the operation of CETA programs in the Balance of State the VEC-CETA Division has also divided the state into five operations areas each with its own Regional Operations Center (ROC). In many ways the ROC offices serve the same function as local prime sponsors. (In selecting four areas of the state in which to do our research we chose two prime sponsor areas and two ROC areas.)

The administrative work of the ROC offices and the planning work of the AMPC's is coordinated by the VEC-CETA Division in Richmond which has final authority for all CETA efforts in the Balance of State area. The CETA Division office has three components: Administration, Planning and Evaluation, and Operations.

In addition to the area planning councils, the Balance of State has a state level council called the Governor Manpower's Planning Council (GMPC). This council is something more than a prime sponsor's council in that it includes in its membership many state level organizations (in a number of instances, duplicating the membership of the GETC). However, the purpose of the GMPC is the same as that of the councils of local prime sponsors and one of the important functions it performs is the fostering of CETA/education linkages. The membership of the GMPC includes representatives from the State Department of Education, the Community College System, a state supported four year college, and a local public school district.

The staff of the VEC-CETA Division seems to be very much aware of the educational linkages that are taking place in the State and

*Responsibility for the individual referral program is now being transferred back to the CETA/BOS office.

has targeted areas (and institutions) where they would like to see new or better linkages. The CETA Division has also produced a reference booklet entitled "Occupational Classroom Training Program: Program Procedures" which is discussed later in this report.

5. Virginia State Advisory Council on Vocational Education (VSACVE)

The Virginia State Advisory Council on Vocational Education was created as a result of the Vocational Education Amendments of 1968. Members of the Council are appointed by the Governor and are representatives of a cross section of groups with an interest in vocational education. The Council, which has 23 members and a full time staff of three, is required to advise the State Board of Education concerning "the operation of vocational programs, to make recommendations for the improvement of vocational education programs, services and activities, and to make annual reports."

The Council annually holds public hearings on vocational education, assists the State Board of Education with evaluations of programs, and reviews and comments on the reports of the Governor's Employment and Training Council.

The VSACVE's relationship with the GETC should provide the best opportunity for a state level linkage between CETA and vocational education. The two Councils are required by their respective legislations to exchange members, so that a representative of the GETC serves on the VSACVE and vice versa. Each Council is also required to review and comment on the annual report of the other and to publish these comments in their own annual report. In making these requirements the federal government has recognized the importance of coordination between these two bodies in the overall effort to provide training and employment to disadvantaged persons. In order for this coordination to have an effect at the local level, however, it is necessary for the two Councils to carefully analyze the problems and make specific recommendations for change (via the review and comment process and joint board participation).

We reviewed the most recent annual report of each Council and particularly noted the comments that each made on the other's report. For the most part the comments were general and did not pinpoint specific problems or make specific recommendations. As the relationship between the two Councils matures we would expect this to change and that the comment process will become a forum for discussing issues of mutual concern. The addition of a full time staff person on the GETC to work on CETA/education linkages should make it easier to identify the kinds of specific problems (for example, the use of secondary school facilities during the summer for training CETA enrollees) that can be addressed at the state level by the two Councils.

The VSACVE annual report includes an important section on recommendations to the State Board of Education. Another section of the report deals with the actions that have been taken by the State Board of Education on previous recommendations. It is obvious from the report that we reviewed that the recommendations of the VSACVE are taken seriously and that appropriate actions are initiated as a result of these recommendations. In this respect the Council has more clout than many such advisory councils, and therefore, the participation of CETA officials on this Council can go beyond mere information sharing and become an effective method of bringing about change.

B. Local Level

The thumbnail sketches contained in this section are intended only to give a general idea of the scope of CETA/educational linkages in the four sections of the state that we visited. As noted in the introduction of this report, the purpose of our visits was not to evaluate the prime sponsors nor any other institution. Accordingly, only enough detail is included to give the reader some idea of the contexts within which our observations were made.

1. Arlington County

The Arlington Office of Manpower Programs serves an urban/suburban area of roughly 130,000 population, which is, of course, part of the Washington, D.C., metropolitan area. Its Executive Director is Gerald Gordon.

Gordon explained that the Arlington prime sponsor works extensively with three kinds of

educational institutions: the public school system (which includes a skill center), community colleges (individual referrals only), and private proprietary schools. The area has no shortage of educational resources, so the prime sponsor has a range of choices for dealing with special situations. For example, it sent three individuals to the George Washington University in Washington, D.C., for medical technologist training. All programs are subcontracted, not run directly by the prime sponsor.

The Northern Virginia Skill Center, which is an agency of the Arlington County public school system, not only runs several Title II-B programs but is the sponsor of an OJT program. The center does aptitude testing and referrals as well as training. The schools also use PSE slots, sponsor in-school CETA programs, and operate the Center for the Foreign Born, whose purpose is to provide job training and employment opportunities for Spanish-speaking and other foreign minority adults (principally Vietnamese at present). Gordon says that his experience with the school system has been "excellent."

The Northern Virginia Community College has two campuses near Arlington, one in Alexandria, the other in Annandale. The Alexandria campus is closer; the Annandale campus, larger. "Community colleges have a lot to offer," Gordon says. "That's why we're starting to move more in that direction." He is strongly committed to the individual referral approach, feeling that the community colleges in his area are sensitive to job market trends and have ample course offerings.

Because the Washington metropolitan area can absorb individuals with special skills, the Arlington prime sponsor also contracts fairly extensively with proprietary schools. For example, a recent contract involved the ITT Business Training Institute to train court reporters. In another instance, however, a sizeable potential contract with Control Data Corporation for training computer programmers fell through because of inability to reach an agreement on indirect costs. This instance will be discussed in more detail later.

2. Peninsula Office of Manpower Programs (POMP)

The Peninsula Office of Manpower Programs (POMP) is a consortium serving six jurisdictions: the cities of Newport News, Hampton, and Williamsburg; the counties of York and James City, and the Town of Poquoson. The total population of the area was estimated in 1976 to be approximately 340,000, and the labor force is approximately 150,000. Taken together, POMP's various programs serve about 3,000 clients each year.

POMP's offices are in Hampton, and its Executive Director is Paul J. Clancey, Jr. He indicated that the agency's linkages with educational institutions are strong and of long standing.

"We have a couple of strengths," he said. "First my predecessor recognized early in the game that we had an educational function and involved the schools early. Second, we are dealing with people of good faith. They have known for a long time what we are about."

He also credits the council-manager form of government in the area as reducing political pressure on the program and adding professional expertise. POMP's board is composed of city managers and county administrators of the jurisdictions it serves. POMP is currently involved in a demonstration plan to consolidate CETA youth programs into a single administrative package.

POMP operates no programs directly, instead subcontracting to several organizations linked closely to the local governments of the area. Through these agencies, POMP has local education agency agreements with all five public school systems within its service area. (The total is five, not six, because Williamsburg/James City County is a combined school system.) Hampton is the site of the Peninsula Manpower Skill Center, operated by the Virginia Peninsula Technical Education Center (Vo-Tech), whose board is the educational parallel of POMP's—i.e., is composed of school board members from each of the five school systems. Another major POMP subcontractor is Thomas Nelson Community College, which operates a program known as "CETA Goes to College"

and is represented on the Peninsula Employment and Training Council.

3. Regional Operations Center #1

Regional Operations Center #1 serves the far southwestern area of Virginia. The 13 counties and three cities in this area have traditionally been areas of high unemployment and limited job opportunities.

The ROC #1 office, which is headed by Gerald Griswold, is located in Abingdon and its various CETA programs served some 10,000 clients during the past year. According to Mr. Griswold, classroom training has always been a significant part of the CETA effort. The area is fortunate to have two of the State's six skill centers, four community colleges (all of which participate to some degree in training CETA clients), and extensive vocational education programs in all of the school districts (some of which provide training for CETA clients).

Coal mining, agriculture and furniture manufacturing are the primary industries and though jobs in many of the counties are scarce, there is a reluctance on the part of some of the residents to seek employment outside of the area. Mrs. Sena Edwards of the Washington County Skill Center sees this as a real problem: "They (the clients) say that they will accept jobs in other places in order to get in the classes, but when the training is over they usually stay here even if they can't find a job."

The construction of the interstate highway system in the past twenty years has opened many of the communities in the area to new growth. (Interstates 81 and 77 run through the area.) However, the mountainous terrain has left those communities not on the interstates even more isolated. New industry and new growth are coming to the area, but almost exclusively to those communities on or near the new roads. Therefore, the pockets of high unemployment and limited job opportunities remain.

4. Regional Operations Center #5

Regional Operations Center #5 is located at the North Campus of the Rappahannock Community College in Warsaw and serves the 17 counties and one city of the Mid-Peninsula, Northern Neck and Eastern Shore areas of the State. The area borders both the Chesapeake Bay and the Atlantic Ocean and is predominately rural. Agriculture and water-related industries make up a large part of the economy. Although the area does not contain a great deal of industry, parts of it are close enough to the major metropolitan areas of Richmond and Hampton/Newport News so that residents can, and do, seek employment in these areas.

Herman Robins, Director of ROC #5, does not see the area changing drastically in the future and has geared the CETA operation toward serving the traditional needs of the area. Auto mechanics, welding, wood working are the basic courses that are taught in CETA classrooms training programs.

The area contains two community colleges, both of which participate in CETA training. The school districts also have very active programs of vocational education. (The Northern Neck has the newest vocational center in the State—a $3 million facility located in Warsaw—which is a cooperative effort of five local jurisdictions.) However, none of the area's school districts participates in CETA training. The ROC has also made individual referrals to several proprietary schools in the Fredericksburg area in the past.

The Rappahannock Community College is by far the largest participant in CETA training in the area. Although the facilities at the college are not officially designated as a skill center, they serve much the same function and are supported to a large extent by funds from the Governor's Special Grant for Vocational Education.

III. EDUCATIONAL INSTITUTIONS

When speaking of educational opportunities for CETA clients, one is generally speaking of vocational or "skills," training. Although a few projects (POMP's "CETA Goes To College" for example) provide broader educational opportunities, most CETA training is aimed at giving a person a "saleable" skill in as short a time as possible.

It is only natural, therefore, that CETA prime sponsors should look to those schools which have traditionally provided such training. Vocational education can be an expensive undertaking often requiring special instructors, equipment and facilities. Therefore, the concept of linking CETA to the existing vocational education network is an important one.

In completing the research for this report we determined that there were four types of institutions which were used most frequently by CETA prime sponsor. They are—as one would suspect—those institutions which already had skills training programs in place: Public secondary schools, skill centers, community colleges, and proprietary schools.

A. Public Secondary Schools

A major emphasis on vocational education in the public schools began in 1963 with the passage of the Vocational Education Act. This Act stressed the importance of an individual acquiring skills to insure personal welfare. It also encouraged cooperation between education and labor and industry to insure that training is matched to the labor market needs. The Act was amended in 1968, 1973, and 1976 and has been expanded to include students with socioeconomic or academic handicaps. Funds provided by the federal government under the Act come into Virginia through the State Department of Education and are allocated the 141 school districts in the state.

The Standards of Quality adopted by the Virginia General Assembly in 1972 require that every local school division provide vocational education as a part of its curriculum. The State Department of Education annually provides about $15 million in federal funds and $18 million in state funds to support vocational education. The construction of vocational training facilities has also been supported by federal funds from such sources as the Economic Development Administration and the Appalachian Development Act.

The public schools obviously have a great deal to offer CETA prime sponsors: facilities, experience in vocational education, and, usually, a high level of community trust. CETA offers the public schools, in addition to an opportunity to be of service, another option for dealing with disadvantaged youth and a chance to defray some of the costs of maintaining plant and equipment on a year-round basis. The linkage between CETA and public schools would, therefore, seem to be natural.

In the four areas visited by us the teaching of vocational education is an established (and often growing) part of the curriculum of the public schools. However, in only a few jurisdictions are there significant linkages with the CETA program (with the exception of the skill centers which are discussed separately in this report). Of the 38 jurisdictions in the four areas only four school divisions operated classroom vocational training for CETA enrollees.

One of the most frequently mentioned reasons for the failure of linkages between public school and CETA is that their planning years are different. This problem, and others that we believe are related to the failure, are discussed later in this report.

B. Skill Centers

Skill centers are vocational education institutions that were originally established under CETA's major legislative predecessor, the Manpower Development and Training Act of 1962. They were designed to serve employment and training clients exclusively and to solve many of the administrative and scheduling problems cited in this report. A skill center's structure is intended to maximize responsiveness to the special needs of CETA clients while minimizing the effects on the sponsoring school system (or systems) of special federal funding regulations.

From the administrative point of view, the skill center is a special-purpose organization that provides a variety of short-term training services, and it may be the site of on-going vocational education for regular students. It functions like a private firm created by the school system to manage its outside contracts, an arrangement that has many parallels in higher education (e.g., university-based laboratories and research centers) but that is somewhat more unusual at the public school level. Its personnel may be on the same pay scale as regular school employees and subject to the same rules and policies, but they are unlikely to have permanent commitments from the school system if federal money ceases to materialize. In union terms, in case of layoffs the skill center workers would not have "bumping rights" over other teachers (nor would the main system's employees have bumping rights over them). This means that the center's director has the same incentive as a private entrepreneur to work out linkage problems.

A recent study by the National Academy of Sciences found that, nationally, the reliance of CETA prime sponsors on skill centers seems to be declining:

> The increase of individual referrals appears to be contributing to the demise of the skill centers...Of the 10 areas in the sample that had been using skill centers, 6 had abandoned them by fiscal 1976, citing reasons such as the limited range of courses, high costs, and poor performance.
>
> ...The prime sponsor appears to be exerting authority over classroom training of the established vocational agencies in somewhat the same way it has with the community-based organizations. The result is a dissolution of the near-monopoly previously held by a few educational agencies.*

We found no evidence of this attitude in the areas we visited. All prime sponsors relied heavily on skill centers for training and regarded them as highly effective institutions. However, the centers certainly do not have a "near-monopoly" on training. The director of one of them remarked that he had submitted ten applications to a prime sponsor in his area, but said that he had no firm indication that contracts were likely to be let "for more than two or three of them." On the other hand, he seemed confident of having basic support for the coming year.

Does the lack of job security make it more difficult to get someone to head up a separate CETA program within the schools? Possibly, but some entreprenurial attitudes are probably desirable for the work, and an administrator preoccupied with job security would be a poor choice in any event.

Because the scope of a skill center's operations might be beyond the reach of most schools without substantial outside funding, it is important to remember that the skill center is only a special case of the "class-size project" approach. For example, the Arlington center operates out of an attractive modern facility built with local funds, but that is incidental. The Arlington "center" began operations in April of 1974, before the present building was completed.

"We used buildings all over," the Director, Wade Morrison, said. "You can rent gas stations if you have to."

Finally, a center may be sponsored by more than one jurisdiction. The centers in Arlington, Washington and Wise Counties are part of the local public school systems, but the skill center in Hampton is a vehicle for cooperation across school district lines in that its board represents a vocational education consortium involving five separate school districts.

C. Community Colleges

The development of the Community College System in Virginia began in 1966. The system grew rapidly and now includes 23 colleges and a total of 34 campuses. (Some colleges have more than one campus.)

The community college system is based on the idea of providing education to meet local needs. The colleges are located throughout the state so that every citizen is within commuting

*William Mirengoff and Lester Rindler, *CETA: Manpower Programs Under Local Control*, National Academy of Sciences (Washington, D.C., 1978), p. 149.

distance of a community college campus. Obviously, if local educational needs were to be met, vocational education had to become a part of the curriculum.

Since their appropriations from the State are based on the number of students (or their full-time equivalent) that are enrolled in the college's programs, community colleges have a built-in incentive to do the kind of job market analysis that is important to CETA prime sponsors. The eight community colleges located in the four areas visited by us offer a wide range of vocational classes ranging from secretarial services to mining machinery repair.

All eight of the colleges were involved in classroom training for CETA clients either through class-size projects or the individual referral program, or both, though some are certainly more active than others.

D. Proprietary Schools

Prior to the passage of the Vocational Education Act of 1963, proprietary schools provided the bulk of the vocational training that was available in many areas of the country. Although the expansion of vocational education curricula in secondary schools and community colleges since that time has limited their growth, a number of these schools continue to exist and to provide a wide range of educational opportunities.

Secretarial schools, welding schools, schools of cosmetology and computer technology all provide basic and advanced courses in their respective fields. As one would expect, however, these schools are almost always located in urban areas where both students and job opportunities are more plentiful. Since they depend on continued enrollment in order to stay in business, these schools usually provide training in skills that are continually in demand—welding and secretarial skills are two good examples. Most of them assist with—or even guarantee—placement once the training is completed.

In many ways the approach of proprietary schools resembles the philosophy behind CETA training in that students are expected to master one particular skill that hopefully will lead directly to a job. Many of these schools pride themselves on their placement rate and their close working relationship with employers.

The proprietary school approach, however, seems to be the one least used by CETA prime sponsors. Some of the reasons for this are discussed in this report.

V. ISSUES/PROBLEMS/RECOMMENDATIONS

The problems of the CETA program, or of any public program, might be divided into three categories: "universal," "purely local," and, as a middle ground between the two, "particular but recurring." By these terms we mean the following:

1. "Universal" problems are those inherent in the attempt to move unemployed people, especially the disadvantaged, into unsubsidized employment. They include uncertainties about the job market and the difficulty of evaluating the quality of placements. Some problems may not, strictly speaking, be universal, but they seem to be a nearly permanent feature of the CETA universe: e.g., the lateness of federal funding. These problems are part of the context within which CETA administrators must work, but they were not the subject of our study. We have assumed that recommending to the GETC that the federal government get out money faster would be as helpful as recommending that the GETC arrange for a mild winter.

2. "Purely local" problems are mainly matters of politics and personalities. As such, they do not lend themselves to useful recommendations from consultants, except in fairly general terms. Some of the recommendations which we have given in response to specific problems, particularly those concerning the planning process, may help to alleviate these "local" problems. However, the pitfalls of politics and personalities go deeper than any individual program or institution and it is impossible to predict that this or that course of action will bring the desired result. They are a part of what is sometimes referred to as "the system." Administrators and educators must learn to work within the system. And unfortunately such learning comes best from experience. Nevertheless, our impression is that local problems are often the most serious obstacles to good educational linkages in CETA.

3. "Particular but recurring" problems involve such matters as incongruent spending cycles (nearly universal), administrative earmarks on budgets, personnel regulations, and accounting procedures. Although administrators sometimes take arrangements of this kind as given, they are ways of doing things that were set up by people and hence can be changed by people, if there is good reason for doing so. It was this type of problem which we endeavored to study in detail in the hope of making practical suggestions for change. Our discussion of these problems and our recommendations are given on the following pages of this report, but it should be noted at the onset that problems of this sort were fewer and less troublesome than we had anticipated. To some extent, that may have been a result of our approach. We were not conducting an evaluation, so we were not trying to discover the current *norm* for cooperation but what the potential might be. Thus we tended to spend more time talking with individuals whose efforts had previously been identified to us as relatively successful.

We had anticipated finding that successful projects were built by overcoming a series of particular problems, but this was generally not the case. What seems closer to the truth—though less exciting—is that successful linkages occur because CETA administrators and educators are genuinely interested in providing training and employment opportunities for their clients and have developed good working relationships.

This conclusion was reinforced by an informal search of the literature pertaining to CETA and educational institutions, covering both government-sponsored and general education publications. There were abundant exhortations to improve communication (implying, of course, that it is frequently poor) but little on the specifics of administrative arrangements. The conclusion of a study somewhat resembling our own, an overview of 22 local programs funded from two or more federal sources (CETA in 12 cases, the Vocational Education Act in nine cases) seems worth quoting:

> One of the most surprising and encouraging findings resulting from

> interviews with the administrators of programs. . . is that the vast majority of respondents could not identify any *serious* or insurmountable problems in obtaining funds from more than one source.* (Emphasis in original.)

The fact that administrators cannot identify any *serious* problems in linking two funding sources makes it even more discouraging when one finds that important linkages are not taking place between CETA and local educational institutions.

We hope that the discussions and recommendations on the following pages will make it easier for linkages to occur.

A. Procedural and Policy Issues

1. Local CETA Politics

One obvious way for educational institutions to increase their chances for CETA funding is for them to be active on the Boards and Committees of the Prime Sponsor. Conversely, prime sponsors who wish to take advantage of the training facilities of an educational institution should invite a member of that institution to serve on their council.

CETA regulations on conflict-of-interest forbid an individual on a planning body from voting on proposals in which his or her organization has a direct financial interest, but the advantages of participating in discussions of priorities are obviously much more important than whether or not a committee member votes or abstains on a particular proposal. Almost all the individuals we talked to who were running substantial programs were members (and, they indicated, relatively active members) of local or state planning or advisory bodies.

This elementary observation received strong statistical confirmation in a study conducted at another level by the American Association of Community and Junior Colleges. The AACJC sent questionnaires to 919 colleges, of whom 519 responded. The questionnaire asked a number of questions about participation in CETA. According to the final report:

> The survey showed that there is a definite correlation between knowledge of how CETA works and participation in CETA programs. For example, only 21% of non-participants state that they know who serve as members of the prime sponsor manpower planning council, while 84% of participants between $100,000 and $499,000, and 93% of participants over $500,000 do have this information.
>
> Similarly, 14% of non-participants responded that their institutions have voting representation on such councils, while 58% of the $100,000 - $499,000 group and 78% of the over $500,000 group have institutional voting representation.*

In short, if a prime sponsor wants to involve an educational institution in the CETA program, it appears that the single most important thing that might be done would be to invite representatives of that institution to participate in planning meetings and other decisions, whether or not a contractual relationship were on the immediate horizon. Similarly, a school administrator wishing to become more involved should attend planning meetings, as an observer if necessary.

CETA was designed to be a "political" program, in the sense that decisions were to be thrashed out among interested parties, rather than being codified into formulas. Since models of cooperation abound, we conclude that there is nothing inherent in the regulations to prevent representatives of different institutional perspectives from working out programs to the extent that they agree on goals. The AACJC concluded its survey with an open-ended question on "the problems and successes of their relationship with their prime sponsor." Here are samples of the responses they received:

*Federal Interagency Committee on Education, Sub-Committee on Education and Work, *Education Service and Work: The Multi-Funded Approach* (Washington, D.C., 1977), p. 20.

*"Community and Junior Colleges and the Comprehensive Employment and Training Act: Participation and Recommendations for Improvement," Office of Governmental Affairs, American Association of Community and Junior Colleges (Washington, D.C., 1977), p. 8.

I have been associated with MDTA and CETA for twelve years. The CETA program is a vast improvement over the MDTA program. The CETA program has allowed much more self determination by local governing boards, industry and citizens. The delivery system of CETA is working better, and gaining momentum each day. Many of the frustrations that I experienced under MDTA no longer exist under CETA.

This institution has been more involved in manpower activities under CETA... This is due to the fact that the CETA program allows more flexibility in the selection and operation of programs which this institution feels are needed to meet the needs of industry and the community.

CETA is a complete failure as far as institutional training goes.

It is a bureaucratic nightmare—mass confusion, programs funded for too brief periods of time, local politics involved too much to let training take place.*

After analyzing these responses, the AACJC commented as follows:

What is perhaps most significant about these comments is the broad range from overwhelming enthusiasm and understanding of the objectives of the program to total frustration and/or confusion by the process of local administration of funds.

The wide range of responses is indicative of the unique quality of each community and its political circumstances. Many claim that CETA is too "political" yet...survey data shows that those that effectively cope with the politics and know or get involved with the manpower planning council, are most likely to do well.*

Recommendation:

That prime sponsors insure that those educational institutions which offer the best potential for training CETA clients have representatives on the local Employment and Training Council.

2. Special Class-Size Project vs. Individual Referrals

Two methods are used to provide vocational classroom training to CETA clients: special class-size projects and individual referrals.

Special classes—such as those conducted at skill centers—enroll only CETA-eligible participants. The prime sponsor contracts with the educational institution for a specific class for a specific number of people. Costs for the instructor, the classroom, the equipment, etc. are all paid for by the prime sponsor. Most special classes operate with a policy of "open entry - open exit," i.e., a participant may enter the class at any time and proceed at his or her own pace and exit whenever he or she has completed the course of studies.

The individual referral approach basically involves first helping a CETA client plan a course of study, then arranging for an educational institution to enroll him or her like any other student and bill the sponsoring project. Under this arrangement clients must enter the class, or classes, on a set date and proceed according to the institution's predetermined schedule so as to complete the class on a specific date.

The trend nationally has been toward more individual referrals and fewer class-size projects, but the debate over which approach is best continues to be strong. A study conducted for the National Research Council contains the following paragraphs:

...Many sponsors moved decisively away from the class-size projects and

*"Community and Junior Colleges and the Comprehensive Employment and Training Act: Participation and Recommendations for Improvement," Office of Governmental Affairs, American Association of Community and Junior Colleges (Washington, D.C., 1977), p. 8.

*"Community and Junior Colleges and the Comprehensive Employment and Training Act: Participation and Recommendations for Improvement," Office of Governmental Affairs, American Association of Community and Junior Colleges (Washington, D.C., 1977), p. 8.

skill centers to much wider use of individual referral. Almost half (10 of 24) of the sample sponsors reported more individual referrals in fiscal 1976. Its advantages to them were a wider range of training facilities and occupational choices, greater flexibility to tailor programs to individual needs, and avoidance of costly commitments to single institutions. Some training could be obtained from public schools at no instruction cost, incidentally achieving a CETA goal of closer coordination with existing agencies.

However, vocational education agency officials have pointed to flaws in a policy of large-scale individual referral: It usually does not address the long-term manpower needs of an area. Because each individual makes a choice from courses that already exist, there is not much motivation for sponsors to add new courses that would be useful. Individual referral may also lead to a policy of selecting the most qualified applicants, because persons without enough education to keep abreast of a standard course may not be referred to such programs. Some vocational educators feel that an academically able CETA enrollee, capable of completing a standard course in a vocational institution, probably should not be consuming CETA resources.*

In the Virginia areas visited for this study prime sponsors were using both methods for providing training to their clients. The class-size project is used in all of the skill centers and in all other CETA training in secondary schools. The community colleges provide both class-size projects and individual referrals. (Not all community colleges in the four areas offered class-size projects, but all of them participated in the individual referral program.) Among proprietary schools the individual referral method was used exclusively.

The individual referral method is clearly the preference of school officials. "We're running enough courses without looking for more unless we see a clear need for them," said William D. Ward, Coordinator of Grant Development for the Northern Virginia Community College. He said that NVCC has conducted some special classes, but the college's normal range of course offerings was broad enough to satisfy most clients.

Although the services provided to the clients are the same, different prime sponsors have different ways of handling the mechanics of individual referrals. One school person we talked to said that an individual referral contract "was as much paperwork as any other kind of contract." Ward indicated that this need not be the case. His institution has contracts with several prime sponsors. One of them, he says, executes a separate contract for each individual referred. The contract specifies courses, textbook costs, and contains all the legal boilerplate of any other contract. In addition, each one must go to the State Department of Education for final approval. Another prime sponsor negotiates one blanket contract for all the students it may choose to refer during the course of a year but pays only for the services that are actually used. Ward indicated the two files, inviting a comparison of their bulk. The file from the prime sponsor using student-by-student contracts was two or three inches thick, and the other was a modest folder containing perhaps a dozen sheets of paper. The more important point, of course, was not the absolute size of the larger file, which contained many copies of the same basic documents, but that the individual contracts in the thick file each contained signatures of several persons representing the prime sponsor, the state and the college, each of whom had to take time to sign each routine agreement.

In the POMP service area, CETA funds are used to pay for an individual referral program called "CETA Goes To College," which is operated through the Thomas Nelson Community College in Hampton. The program began in 1976 using state discretionary money

*Mirengoff and Rindler, CETA: Manpower Programs Under Local Control, p. 128.

to pilot it. Initially 35 individuals were supported; this year there will be about 80. Students may enter either a one-year or a two-year program and may take any of the technical courses of study for which they qualify. (Because of shortages of funds, they may not be reimbursed for developmental studies designed to enable them to meet entry requirements.)

According to Howard T. Taylor, educational representative to POMP from Thomas Nelson Community College, the program gives students the academic credentials and the confidence they need to function well in the job world. They are integrated into regular courses with no special handling, except that they are kept together for counseling purposes. Dropouts have been infrequent, Taylor says, and then almost always for personal reasons, usually transportation, rather than academic problems.

Although the secondary school officials we talked to are not involved in the individual referral program, they clearly would prefer it to operating special classes and they echoed William Ward's sentiment when asked about establishing special classes for CETA. With the exception of those who operate skill centers, the overwhelming response was "not interested." However, almost all of them indicated no objection to accepting individual CETA clients in their adult classes. (Several vocational education directors felt that CETA clients could probably be admitted to their in-school classes on a "space available" basis.) In most jurisdictions a wide range of vocational courses are offered. Tuition ranges from free to $45 and the course length varies from 20 to 120 hours. The physical facilities in many jurisdictions are excellent.

Both the State and Federal governments provide substantial amounts of funding to local school districts for the operation of vocational education programs. Facilities have been built, equipment purchased, instructors hired and curricula developed. In most areas both in-school and adult classes are offered. Although the system is admittedly of uneven quality state-wide, the Department of Education is continually working to upgrade it.

It would appear, therefore, that education officials are justified in their preference for the individual referral system. There are already two state-wide systems (secondary schools and community colleges) that offer vocational education.

So why have special class-size projects at all? There were many answers given to that question in the course of our study. Some of them echo the comments cited in the National Research Council study quoted earlier. But the basic underlying argument seems to be that CETA clients are "different" and therefore must be trained differently. Said one CETA official: "Special classes geared to the needs of our (CETA) clients are what the (CETA) voc ed program is all about."

In areas that have skill centers one can believe that it is what CETA training *should* be about. Skill centers were established (under MDTA) especially for CETA type vocational training. The centers that we visited were thriving, were turning out a high percentage of placements, and were highly regarded by the prime sponsors. Unfortunately, there are only seven skill centers in the State. In other areas of the State, special CETA classes—although often very successful—are viewed less than enthusiastically by those who operate them. The reasons for this are obvious. They require a special effort on the part of the educational institution, and this effort is often viewed as a duplication of the institution's ongoing effort.

The ideal solution would appear to be the establishment of a skill center in every prime sponsor area and in strategic locations throughout the Balance of State area. This, of course, cannot be done because skill centers are very expensive to set up and operate and there simply is not enough money available to set up a comprehensive, state-wide network of skill centers.

The alternative solution would be to turn over all CETA vocational training to the educational institutions through the exclusive use of the individual referral method. This will not happen because many CETA clients do need special attention—remedial education, counseling, and the like. The individual referral method cannot offer the full range of manpower services at this time.

Both approaches to vocational training will—and should—continue, but as training opportunities for CETA clients are expanded we recommend the following:

Recommendations:

1. *That the GETC staff review the procedure for individual referrals used by each prime sponsor and encourage a wider use of blanket contracts or other devices to discourage wasteful student-by-student contracts.*

2. *That the CETA/BOS office study the possibility of setting up one or more new skill centers which would serve a number of jurisdictions in areas of the State where vocational training for CETA clients has traditionally been weak. (This should be done with the full cooperation and support of the local school divisions.)*

3. *That the GETC staff, the prime sponsors and the Comprehensive Employment and Training Services office explore ways through which individual CETA clients could be placed in the ongoing vocational classes of the secondary schools.*

4. *That skill centers and other special class-size training projects that have consistently proven successful be guaranteed a base funding each year (subject, of course, to the availability of federal funds and continued good performance.)**

3. Placements and Cost Per Placement

Earlier in this report we stated that the "new" CETA is aimed primarily at structural unemployment, i.e., at individuals who have low job skills and other attributes that make them hard to employ. To serve them, the program emphasis must be on *training*. Administrators whose orientation has been toward training all along remark with satisfaction that the Department of Labor "is putting the 'T' back into CETA." This emphasis obviously offers a larger potential role to schools and other training institutions. At the same time, it re-emphasizes a dilemma familiar to CETA project operators: The more disadvantaged the clientele, the harder it becomes to achieve a high rate of placement in unsubsidized unemployment.

This dilemma is magnified by the emphasis on placements and the cost per placement. These are understandably direct ways of measuring the success of a project. Yet in being direct they ignore the subtleties of measuring a project's success. During the time when CETA was hiring a great many people merely because they were unemployed, the placement problem often took care of itself. College-educated—or well-trained and experienced—enrollees eventually left CETA for better paying, unsubsidized jobs as the economy improved. Many placements were recorded with little or no effort on the part of the prime sponsor, or their project operators.

With the renewed emphasis now on serving the disadvantaged and structurally unemployed, prime sponsors are going to have a more difficult time achieving high placement rates. This, coupled with the length and type of training that will be required, will increase the cost per placement. Critics, looking at the "new" CETA and these new statistics, are likely to charge that the new CETA is even worse than the old CETA.

During our interviews with CETA officials and educators, we frequently heard the phrase "quality of placement." The phrase means slightly different things to different people but generally what is meant is the duration of the placement, the job level at placement, and the potential for advancement. Placement statistics only show the number of persons who entered employment at the end of their CETA training (or employment). A person who remains employed for only a brief period will forever remain a placement in the eyes of the Labor Department. Likewise, a person who completes CETA training and is not immediately placed (before the close of the next reporting period) will never show up as a placement, despite the fact that six weeks later

*We have the impression that an informal understanding to this effect already exists.

he or she finds a job using the skills they acquired in the CETA program.

One could argue of course that over the entire CETA program the figures even out and result in a reasonably accurate picture of CETA's success or failure. But educators view this reporting practice as unfair. The institutions—community colleges in particular—feel that they are preparing enrollees for a life long vocation and that success or failure should not be judged entirely at the moment that the enrollee leaves the institution. Further, many of them would like to provide general education classes to CETA enrollees. (One college, for instance, insists that CETA enrollees should be given courses in Assertiveness Training, Human Relations, Career Decision Making and Basic Communications Skills.) Prime sponsors tend to object to such courses on the basis that they increase the cost of training and hence the cost per placement. There is no proof, of course, that these courses (or other non-vocational training efforts) increase the "quality" of placement. However, the whole question of placement needs to be re-examined in light of the CETA new commitment to serve the structurally unemployed almost exclusively.

The whole subject of evaluation of employment and training programs is complex and beyond the scope of this report. One of our interviewees, William D. Ward, Coordinator of Grant Development for Northern Virginia Community College, remarked that the CETA program reminded him of a pitot tube, a device for measuring the velocity of a fluid (such as air speed) which has a large opening at either end and a narrow neck in the middle. CETA regulations, he indicated, required careful tracking of enrollees' progress during the actual course of enrollment (the narrow neck of the tube) but left major questions unanswered about their lives before intake and after placement (the broad entry and exit portions of the tube).

At the national level, the most comprehensive attempt at CETA evaluation is an ongoing study known as the Continuous Longitudinal Manpower Survey, which follows a large and regularly renewed sample of enrollees up to 18 months after entry. The study is being conducted by Westat, Inc. and information on it is available from the Office of Program Evaluation, Employment and Training Administration, U.S. Department of Labor, Washington, D.C. 20213.

Recommendations:

1. *That the GETC examine the method of reporting placements to determine if factors can be included that would reflect the quality of placements.*

2. *That the GETC and the prime sponsors study the findings of the Continuous Longitudinal Manpower Survey (and other similar studies) to determine what factors are most beneficial in producing "quality placements."*

4. Private Proprietary Schools

In the areas covered by this study private proprietary schools were not frequently used to provide training for CETA clients although there were a number of such schools in the areas which seemed capable.

Most CETA administrators are probably more careful about using private schools on purely pragmatic grounds:

"It opens me up to more criticism if the relation turns sour," one said. "No one criticizes me if the public schools fail to deliver."

"There is a sense of mistrust about propriety schools," said Mary Jo Greco, Career Education Representative for Control Data Institute. "It's partly vocabulary. For example, we term an 'admission' a 'sale,' and that has a negative connotation. However, I think there should be as many options as possible open to any public program."

The reasons for not contracting with proprietary schools seem to reflect political or personal decisions rather than the capabilities of the particular schools. One example that seems worth mentioning involved the Control Data Institute (CDI), a national firm with an office in Arlington.

We learned that one prime sponsor had been unable to enter into a contract with CDI because of the firm's refusal to itemize the direct costs on which its tuition rate was based. The

prime sponsor explained that his county requires that all public contracts be based on itemized, auditable costs, and that indirect costs were simply not allowable. The company's refusal to disclose the basis for its tuition charges was based on the observation that doing so would give its competitors valuable information, and that the prime sponsor could not assure confidentiality because an audit is a public document.

We found that CDI's Arlington office had, however, entered into contracts with six prime sponsors and four other jurisdictions (in both Virginia and Maryland).

One noted that his agency's working relations with CDI had been excellent. Among the pluses he mentioned: (1) the firm's willingness to negotiate a performance contract, linking payment to achievement of a certain placement rate in training-related jobs at a relatively high entrance salary; and (2) a prompt refund of tuition when an enrollee dropped out.

Our review of screening procedures, corroborated by sponsor comments, was that CDI is at least as selective about its "sales" as tax-supported administrators are about adding "full time equivalents." Working with private schools appears to require essentially the same caution that should be observed with any contract, principally a careful scrutiny of placement rates, verified by reference checks. Tuitions and fees should be in line with those that other institutions charge for comparable services, of course, and the charges to CETA should be the same as those levied on any paying customer.

Recommendations:

1. *That a representative of the State Association of Private Career Schools be asked to serve on the Governor's Employment and Training Council.*

5. Educational Linkage Coordinators At State and Local Levels

As we have pointed out, CETA is a manpower program that is controlled at the local, prime sponsor level. There are many advantages to this decentralization of power and the Department of Labor has repeatedly stressed its intention of keeping major responsibility for the CETA program at the local level. There are some disadvantages, however, and they become more noticeable when looking at the State as a whole.

The fact that there is no strong State coordination has resulted in local programs differing to a greater degree than is normal in a state-wide program. The differences are generally minor—different forms, different funding procedures, different regulations on what will and will not be paid for the CETA funds—but taken as a whole they can be quite confusing to an educational institution which serves two or more prime sponsor areas.

A strong state system might eliminate some of these problems (though probably creating others) but obviously the system is not going to be changed in the immediate future. This is the kind of problem that would generally fall under the "universal" category that we have described, but in the case of educational linkages it appears that it might be possible to have a little of both worlds—central, state-wide coordination and local control. The funds for educational linkages are granted to the State under the Governor's Special Grants. Obviously the efforts in this area were intended to be coordinated in all prime sponsor jurisdictions by the State. This is a reasonable approach since two state agencies—the Department of Education and the Community College System—oversee the local educational institutions which provide most of the vocational training to CETA clients in the State.

In Virginia the GETC controls the funds for educational linkages. The GETC, in addition to contracting for a number of studies and evaluations of previous linkage efforts, has hired a full-time Educational Linkages Coordinator. We believe that this is a much needed position and we recommend that this person be given the authority to lead the educational linkage efforts in the State. Obviously this will require the cooperation of the prime sponsors and a great deal of work on their parts as well. One way to insure this cooperation and to assist the prime sponsor at the same time would be to provide a grant to each prime sponsor (and each ROC in the case of the Balance of State) from the educational

linkages fund specifically for the purpose of hiring a local educational linkage coordinator. A funded position would also insure that all prime sponsors participated in a state-wide coordinated effort to establish CETA/education linkages. We are not recommending that these positions be immediately created and funded. However, the question does warrant further study by the GETC and the prime sponsors.

Recommendations:

1. *That the GETC staff foster an exchange of linkage information among all prime sponsors.*

2. *That the GETC staff and prime sponsors develop a job description* for local Educational Linkages Coordinators and study the possibility of funding such positions through grants from the Governor's Special Grant for Educational Linkages.*

B Specific Problems

1. Problem: *Lack of knowledge of the CETA program among school officials.*

Almost everyone has heard of CETA, but what they have heard is not always good, or accurate, or very useful in fostering productive relationships with education institutions. Ignorance of the CETA program takes two forms: Complacent ignorance which comes from believing only what is printed in the newspaper; and frustrated ignorance which comes from trying to read the CETA regulations.

The situation is not made any better by CETA officials who are knowledgeable of CETA regulations. They tend to speak in a special language that leaves an outsider scratching his head. "AMPC, PIC, BOS, ROC" are all a part of their vocabulary. "Title VI" is spoken of as if its contents were as commonly known as one of the Ten Commandments.

Compounding the confusion are the inevitable changes that are periodically wrought on federal legislation and regulations. Thus, "most of the old Title I is now Title II" and "The Governor's 5% fund is now 6%."

Given this language barrier, the wonder is not that there are not better linkages; but that there are any.

But if language were the basic problem, it could be solved by offering a course in "CETA AS A SECOND LANGUAGE." The fact is, CETA is a complicated—sometimes confusing—piece of legislation with correspondingly complicated regulations which—when they reach the local level—sometimes lend themselves to a variety of interpretations. Language is only one of the problems.

Among the educators that we talked to, there seemed to be a consensus that someone on the school staff needs to specialize in CETA regulations. This need not be a full-time job, nor even a half-time one, but it is almost certainly not a job that should simply be added to the duties of someone who already has a full-time job.

From the CETA point of view, the prime sponsors need to assist the educational institutions in understanding the CETA regulations. There are a number of ways that this can be done.

Recommendations:

1. *That the GETC produce an attractive brochure which briefly outlines the highlights of the new CETA regulations. Ample quantities should be made available to all prime sponsors for further distribution to the educational institutions (or any other agency or individual that would benefit).*

2. *That the workshops for educators that are now being conducted by VPI and SU (under a grant from the Educational Linkage Funds) be evaluated by the GETC staff to determine if further training of this kind is needed. (In-put from educators who have participated in these workshops should be solicited.)*

*The Thomas Nelson Community College submitted a proposal to the GETC for funding under the educational linkages funds to develop a position for POMP area similar to the position we are recommending. This proposal, though not funded, contained a proposed job description for a linkage coordinator.

3. That educational institutions which are applying (or considering application) for the first time be given fairly extensive technical assistance by the prime sponsor. (This could be one of the duties of a local Educational Linkages Coordinator.)

***2. Problem:** Lack of clear, easy-to-understand program procedures.*

Classroom training is a specific activity of the CETA program. Each prime sponsor has a set of procedures that must be followed by institutions providing classroom training. These procedures are generally based on the CETA regulations but they go beyond the regulations and spell out the specific details of how the program will operate on the local level. These procedures include such things as who will make referrals, what forms will be used, where they will be sent, class attendance requirements, allowance payment procedures, etc.

The Balance of State prime sponsor has published a handbook entitled "Occupational Classroom Training Program: Program Procedures." This booklet gives instructions on the CETA classroom training program in the BOS area and appeared to us to be a good attempt to make the mechanics of the program understandable and accessible, though in need of updating and better layout. It includes sample forms, mailing addresses and the kind of practical information that is invaluable to program operators and certainly informative to those who are contemplating operating programs.

The Balance of State, with its large budget and wide geographic territory, obviously has a greater need for a procedures booklet for its contractors than do smaller, local prime sponsors but the development of clear instructions on the daily operation of programs should be a concern of every prime sponsor. No doubt other prime sponsors have developed procedures guides, but a renewed effort by all prime sponsors in this area would in our opinion go a long way toward improving educational linkages.

Recommendations:

1. That all prime sponsors review their operating procedures for classroom training, update them, and put them together in an easy-to-use format.

2. That the GETC staff foster an exchange of information on such matters.

***3. Problem:** The planning years of CETA and educational institutions are "out of synch."*

The most frequently mentioned problem, even in closely cooperating districts, is that CETA and public school planning and budget cycles are usually "out of synch." CETA programs use the federal fiscal year (October 1 to September 30), while most schools use a different period (July 1 to June 30). It is not clear, however, that planning was any easier prior to 1976, when the federal fiscal year was also July 1 through June 30.

"It gives agencies a good excuse not to cooperate," one prime sponsor executive said.

The "out of synch" issue, on examination, turns out to be a short-hand way of expressing four distinctly different problems which have to be addressed separately.

First, the date for submitting annual plans is different. Educational institutions usually prepare and submit their annual plans in the spring. CETA prime sponsors submit their annual plans in the summer. Educators, especially at the secondary school level, indicate that they cannot operate programs that are not given in the plan and that they do not know when they submit their plans what CETA funding will be available. However, educational institutions familiar with CETA programs do not seem to have the problem. They either submit plans that are broad enough to cover any possible CETA project they might be funded for, or they submit changes to their plans at a later date.

Second, there is the bookkeeping and accounting problem, which is not a serious problem either except for the initial labor of establishing a separate system for CETA funds. The fiscal officers of some schools that have not previously participated in CETA may wish to avoid this extra accounting work

(which is independent of program size in that it takes about as much effort to set up the books for a $10,000 contract as for a $100,000 one), but there is nothing particularly difficult about it. We are reminded of a comment made to us by an agency head when we were doing work on another study: "Either your fiscal officer works for you," observed this director, "or you work for your fiscal officer." Those institutions which operate good programs seem to have solved this problem.

Third, the "out of synch" phrase may mask a deeper philosophical difference over how long a training period should be. Schools are generally oriented toward vocational education programs that are tied to the high school curriculum. As Leonard Ferrara of the BOS/CETA explains it: "...most vocational education programs (in public schools) are known in CETA as "two-hour-two-year" programs, i.e., the student attends a technical class for two hours a day for two years. That class is usually an elective which is part of the student's overall high school education. Very few school systems have been willing to train CETA participants on a full-time basis." Generally speaking, CETA sponsors are likely to believe that shorter, full-time training periods are more appropriate for most of their clients, except in special cases. (For example, the BOS Procedures Manual cited earlier states: "The mission of occupational classroom training...is to train available members of the work force...in the shortest period of time possible.") This issue, of course, would be a legitimate obstacle to joint work even if all uncertainties over funding and all scheduling differences were removed.

Fourth, even where there is no disagreement in principle, "out of synch" may reflect a legitimate scheduling problem, e.g., the difficulty of fitting a three-month class of CETA enrollees into a nine-month system, or starting beginning students in the second half of a cycle of courses.

There are no easy solutions to these problems. The establishment of good linkages requires that the participating parties remain flexible. It is the curse of the bureaucracy that reasons can always be found for *not* doing something.

Recommendations:

1. *That the prime sponsor's planners participate in the planning process of local educational institutions to the maximum extent possible, and that educational institutions be encouraged to take an active role in the prime sponsor's planning process.*

4. *Problem:* *Educational institutions do not anticipate the problems they will face in serving the economically disadvantaged.*

One of the most common complaints that we heard while conducting our research involved the CETA clients themselves. Educators spoke of "the type of people" that are sent to them for training. By this, they meant to imply that they were poorly educated, handicapped, poorly motivated, or had a host of other problems. They were, in short, just the type of people that CETA is supposed to serve. To quote the Comprehensive Employment and Training Act: "It is the purpose of this Act to: (1) provide training and employment opportunities to increase the earned income of economically disadvantaged, unemployed, or underemployed persons..."

Unfortunately some educators do not seem prepared to serve this segment of the population. They are accustomed to serving individuals who have fewer problems and are reasonably well motivated. The result is that they look at the task of serving CETA enrollees as a burden. They feel even more burdened by pressure from the prime sponsors to achieve a high placement rate at as low a cost as possible.

It is not that they do not want to serve CETA clients. They are merely unprepared to serve them. This is probably one reason why some people expressed the opinion that CETA clients are a special case and must be treated differently. While we would not agree that making a special case of them is the best approach, we would agree that educators need to prepare for them differently.

Recommendations:

1. *That the GETC through its Educational Linkages Grant conduct one or more workshops for educators (includ-*

*ing teachers and counselors as well as administrators) that deal with the difficulties—and the challenges—of training the economically disadvantaged.**

*5. **Problem:** The difficulty in finding qualified vocational instructors for short-term classes.*

There is universal agreement that the quality of classroom training is dependent on the instructor. It is also pretty generally agreed that good trades instructors are hard to find, especially in the rural areas. The reason for this says George Byers of the Comprehensive Employment and Training Office of the State Department of Education, is that "the best trades instructors come out of industry." In large metropolitan areas with lots of industry it is not as difficult to hire an instructor out of industry, but in rural areas with little industry the problem is a serious one.

The short-term nature of some projects—and the lack of permanent funding in all projects—often prevents instructors from relocating to take such jobs. The problem is further compounded by the fact that tradesmen can frequently make a better salary working in their trade than they can as classroom instructors. Mr. Byers also cited the fact that some colleges are reluctant to pay trades instructors more than regular faculty members.

During the course of this study several suggestions were made on how to solve this problem. It was suggested that a state agency (perhaps the Department of Education or GETC) serve as a clearing house for job openings and persons looking for jobs. This state agency could—if needed—publish notices in various state newsletters or advertise the positions in trade journals.

It was also suggested that the vocational education training program at VPI might serve as a resource in locating or providing instructors in rural areas.

Recommendations:

1. That the GETC staff identify those institutions that are having problems hiring qualified vocational instructors and explore ways of assisting them. This effort could lead to an ongoing arrangement at the state level that would match instructors with jobs.

*6. **Problem:** The short-term funding under CETA contracts combined with normal state hiring procedures causes cash flow problems to local community colleges and late paychecks to instructors.*

Community colleges which operate class-size projects must often hire special instructors to teach these classes. These instructors must be put on the state payroll, but only after the CETA contracts have been properly executed. When the contracts end, the instructors must be removed from the payroll even though a new contract may be pending.

Under ideal circumstances the process for establishing a new instructor position at a community college and filling that position takes 8-10 weeks. There is at present no regulation which allows priority in the hiring procedures for short-term funding projects. When CETA contracts are issued for a part of a year, as they were five times in the past year, the local business manager has "employees" on and off contracts with no effective coordination in time between the contract period and employment period. With contracts and employment occurring, even ending, before the payroll process is established at the state system level, the local manager issues advances to CETA enrollees from a local petty cash account, obtains funds on loan from the state system, takes notes from instructors guaranteeing repayment, receives payroll checks from instructors back into petty cash and issues another check for the difference between the advance and the amount actually received.

It was suggested by the business managers at the local and state level of the community college system that the state might promulgate

*In commenting on an earlier draft of this report, Leonard Ferrara of the CETA/BOS had this to say: "I prefer to believe, as do the authors, that educators want to serve CETA clients but are merely unprepared to do so. [This] recommendation...is not strong enough. Workshops are fine, but educators will need the resources to do the job, such as CETA funds to hire specialized staff to train CETA clients. In individual referral, the trainee must have access to continued manpower services during training, which is not happening at this time." We agree, and hope that his observations will add strength to this recommendation.

regulations which give priority to the hiring of CETA instructors. Discussion of this idea with the Office of the Secretary of Administration and Finance provided no indication that this was likely and rather suggested a need for streamlining the process at the departmental level.

Recommendations:

1. That the State Community College System and the State Department of Personnel be requested by the GETC to work out a procedure for streamlining the hiring process for instructors for CETA training. If necessary, assistance should be sought from the Office of the Secretary of Administration and Finance.

V. SOME FINAL OBSERVATIONS

Late in 1977, Ernest G. Green, Assistant Secretary of Labor for Employment and Training, told a national convention of the American Vocational Association that "the vital connection between school and work is receiving increased attention." With respect to educational linkages, he said:

> In all these areas there has been increased cooperation, but the CETA/voc ed relationship is still plagued by the same old problems of breakdown in communication, struggle over turf, duplication of effort, and lack of mutual understanding.*

In preparing this report, we interviewed individuals representing many kinds of institutions, yet we found only a few instances of the kinds of problems Green described. Frequently, however, interviewees mentioned having heard of such problems somewhere else. This might mean that problems are comparatively rare, or that we happened to visit sites where cooperation is unusually good. The latter is a possibility because, since we were not conducting an evaluation, we tended to spend more time talking with individuals whose efforts at establishing linkages had been previously identified to us as relatively successful.

In any event, our principal conclusion may be summarized briefly:

Obstacles exist to establishing productive working relations between CETA and educational institutions, but they are overcome with relative ease when good personal relationships exist between administrators on both sides.

We have discussed a number of difficult problems in this report—scheduling, curriculum planning, locating qualified instructors, and adapting programs for the special needs of the disadvantaged—but the successful program operators we interviewed spent their energies on real problems, not complaints that their hands were tied by restrictive guidelines. We did observe that almost all the individuals to whom we talked who were running substantial programs were members of local or state planning and advisory bodies. Apparently, many were active members.

"Linkages," of course, are merely a means to an end, not an end in themselves. The goal of CETA is to move enrollees into unsubsidized employment, and prime sponsors are responsible for selecting the most cost-effective ways of doing that. This will generally involve working with a wide variety of educational institutions.

As an informal summary, we might make the following comments:

1. Prime sponsors wishing to involve new institutions should make personal contacts with the administrators of those institutions, inviting them to participate in an advisory capacity when the RFP process does not permit active solicitation of a proposal. Face-to-face contact is obviously superior to a letter. Educational administrators wishing better communication should take similar steps.

2. Without suggesting that the individual referral model is the best in every instance, it clearly offers a way of beginning cooperation on a modest scale. It requires the least adaptation on the part of the training institution. It appears that it might be used more frequently than is presently the case at the secondary school level.

3. Prime sponsors should periodically evaluate their forms and procedures to make sure they are really as efficient as they might be. Training institutions that dealt with more than one prime sponsor noted wide differences in such things as the clarity of RFPs and simplicity of paperwork.

4. When dealing with new applicants, prime sponsors may wish to offer fairly extensive technical assistance on regulations and proposals. This kind of working together was a common pattern within jurisdictions with strong programmatic linkages.

5. Prime sponsors need to spend some time mastering the main points of the regulations

*"Better Job Information and Training Ahead for Unemployed Youth," American Vocational Journal (now named VocEd) (February, 1978.)

governing schools and training institutions. When this is done, some apparent obstacles can be discounted, and real ones can be met squarely. For example, prime sponsors who understand the reasons why schools cannot give academic credit for all work experience are in a better position to help justify legitimate instances when credit might be offered.

As CETA renews its emphasis on working with the disadvantaged, its costs and benefits will be even harder to measure than was the case while it focused strongly on general employment benefits. It is crucial that differences in administrative styles and procedures not divert energies from arriving at the best use of resources to serve clients.

APPENDIX I

PERSONS INTERVIEWED

In preparing this report the contractor and his representative interviewed individuals within four areas of the state: two prime sponsor areas and two Regional Operations Center areas within the Balance of State area. These areas were (1) Arlington County Prime Sponsor, (2) Peninsula Office of Manpower Programs, (3) Regional Operations Center #1 (Southwest Virginia), and (4) Regional Operations Center #5 (Eastern Shore, Middle Peninsula, Northern Neck, and Fredericksburg area). A few contacts were made outside these areas.

These interviews were informal and open-ended. Interviewers normally began by asking interviewees to describe their part in an ongoing program and how decisions were made. Where time permitted, the topics covered in each interview included (a) the local decision-making process, (b) the interviewee's sense of problems, (c) and the interviewee's suggestions on program improvements. We attempted to avoid leading questions; e.g., "Could you describe the proposal-writing process?" was preferred to "Is the proposal-writing process cumbersome?" However, we did not hesitate to probe when an interviewee raised an issue.

We are grateful to all the persons listed below who gave their time to this study, especially those whose names are preceeded by an asterisk who were kind enough to review a draft version of this report. They are not, of course, in any way responsible for the report's conclusions, nor for any errors that it may contain.

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APPENDIX II

NOTE ON THE AUTHORS

Lawrence J. Reynolds, the principal investigator and co-author of this report, is president of Lawrence J. Reynolds, Inc., an independent consulting firm in Richmond, Virginia. His work with manpower training programs began in 1967 when he was the reports officer for an experimental manpower program in North Carolina funded by the federal Manpower Development and Training Act. He has worked as a planner and public information officer for the Anne Arundel County (Maryland) Economic Opportunity Committee and as State director of the Virginia Winterization Program prior to becoming a consultant. Recent projects include an administrative procedures manual for the Pennsylvania Bureau of Community Energy and an assessment of energy conservation programs in federal Region III (section on Virginia programs) which was done for the Syracus Research Corporation. He is the author of a number of papers and reports on federal grants management and energy conservation. He holds a masters degree in creative writing from the University of North Carolina at Greensboro.

Fred D. Baldwin, co-author of this report, is a free-lance consultant living in Carlisle, Pennsylvania. During ten years in the federal government, he was a Regional Administrator of the Community Action Program of the U.S. Office of Economic Opportunity and a Social Science Analyst within the same agency's Office of Planning, Research, and Evaluation. He also worked within the Office of Air and Water Programs of the U.S. Environmental Protection Agency. After leaving the government, he spent three years as a Senior Research Fellow at the Syracuse Research Corporation. His projects included direction of an evaluation of the CSA Weatherization Program in Region III and a policy analysis of the program as a whole. During the two years he has worked independently, he has written numerous reports and articles on a wide range of public policy issues. He holds a Ph.D. in American history from Princeton University.